

REMARKS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and amended as necessary to more clearly and particularly describe the subject matter which applicant regards as the invention.

Claims 1-7, 9, 12, 14-16 and 21 remain in the application. Claims 8 and 10 are newly cancelled. Claims 11, 13, and 17-20 were previously cancelled. Claim 21 is new and consideration of new claim 21 is respectfully requested. Claim 21 defines the orienting device in a manner not disclosed by the relevant cited art.

Claim 1 has been amended to more particularly describe the invention, but does not include new matter. The claim has been amended to distinguish the claimed invention from the prior art as interpreted by the Examiner, namely the patent references to Herrmann (U.S. 6,264,133), hereinafter Herrmann, and Vainio et al. (U.S. 5,286,157), hereinafter Vainio, and Ach et al (U.S. 3,887,097), hereinafter Ach.

Specifically, claim 1 has been amended to more specifically limit the claimed orienting device, within the installation, to an embodiment wherein the orientation device can receive only one positioning device at a time. This is important because after releasing the single positioning device and while this released positioning device is removing or positioning a roll support at a winding station, the orienting device, now empty, can be moved into a new position to receive another positioning device. This makes the installation more time efficient.

Claims 1-10, 12 and 14-16 have been rejected under 35 U.S.C. §112, first

paragraph, as failing to comply with the written description requirement. Specifically, the Examiner states that the original specification fails to disclose the feature of the number of positioning devices being considerably smaller than the number of roll supports and the number of primary transport paths. Applicant respectfully disagrees. This relationship is clearly shown in Figures 1-8 and specifically Figure 10. Reconsideration and withdrawal of the rejection of claims 1-10, 12 and 14-16 under §112, first paragraph, is respectfully requested.

Claims 1-10, 12 and 14-16 have been rejected under §112, second paragraph, as being indefinite. Specifically, the Examiner has requested that the term "is located" be added to the end of the phrase "a plurality of the storage places" in claim 1. This change has been made. Withdrawal of the rejection of claims 1-10, 12 and 14-16 under §112, second paragraph is respectfully requested.

Claims 1-10, 12 and 14-16 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Herrmann in view of Vainio and Ach. For the following reasons, the Examiner's rejection is traversed.

The system disclosed by Herrmann is used to handle rolls of printed products. It includes a manipulator having at least two coupling parts (2) arranged around a vertical rotation axis with an angle of 90 degrees between the two coupling parts. Each manipulator coupling-part (2) can be coupled to an additional coupling part (2') arranged on the rear narrow side of a roll support (3). For an exchange of roll supports, the manipulator (1), to which an empty roll support (3) is coupled, is moved to a winding station (W) such that the full roll support (3) to be replaced can be coupled to the second coupling part (2) of the manipulator. Then the manipulator, while being aligned with the winding station, is removed just out from the winding

station (W) into a "shunting area." The manipulator (1) is then rotated by 90 degrees, without additional lateral movement, in order to orient the empty roll support to the winding station (W). The manipulator remains aligned with the winding station. The empty roll support (3) is then introduced into the winding station (W) and is decoupled. The transfer can be quickly done, in a small area. Then the manipulator (1) is withdrawn together with the removed full roll support.

Vainio discloses an apparatus for storing paper rolls in storage shelving that includes a transport carriage of a stacker, wherein the transport carriage retrieves a paper roll from a reception station and then returns to the stacker which then moves the carriage and the paper roll resting thereon to a given location in the shelving. The transport carriage then delivers the roll further into the appropriate corridor in the shelving, eventually filling the corridors with paper rolls.

Ach discloses an apparatus for automatic loading of an elevator cabin and includes a transport carriage 8 that can roll into an elevator car on rails 7 after bridge members 9 on one side of the cabin are flipped down into a loading position (bridge members on the opposite side are selectively placed in the up position).

Regarding claim 1, even if the references were combined in the manner suggested by the Examiner, the claimed invention would not result. A combination of the teachings of Herrmann and Vainio, when used for loading and unloading printed products wound on cores at a winding station, would include the manipulator of Herrmann, but this manipulator would include a separable transport carriage portion as suggested by Vainio. However, the proposed combination would not teach an orienting device (rotating portion) for accepting *only one positioning device at one time*, as required, but would instead include multiple transport carriage portions so

loading and unloading of the winder could still be accomplished by the manipulator in a single move to a "shunting area" and thus maintain the efficiencies in speed and minimization of operating space desired by Herrmann. Said in another way, a different combination of Herrmann and Vainio that provided a manipulator that could hold *only one roll support* would destroy the intended function of Herrmann, namely the efficient loading and unloading of a winding station in a short period of time and within a small operating "shunting" area. Thus, the combination of references in a manner which provides only a single transport carriage portion is not proper and as a result, the only feasible combination of Herrmann and Vainio fails to teach all of the features of the claimed invention.

The teachings of Ach do nothing to change the deficiencies of the Herrmann and Vainio combination in this regard.

Further, there is really no motivation or suggestion in the art, in general, to combine the Herrmann and Vainio references. Vainio is directed to the simple movement and storage of full paper rolls, namely taking full rolls from a single drop off point and moving them to several storage points which, thus, facilitates their later use. Herrmann, on the other hand, is directed to the alternative manipulation of full and empty rolls of articles at a winding station, namely first unloading a full roll then loading an empty roll in an efficient manner. Because Herrmann is directed to the movement and swapping of full and empty rolls, one would not look to the teaching of Vainio which is directed to only movement of full paper rolls.

There is also no motivation in the art to combine the Herrmann and Ach teachings. These patents are clearly directed to non-analogous art. Herrmann is directed to the movement and swapping of full and empty rolls of material out of a

winding station. Ach, quite differently, is directed to a loading device for placing pallets, container, beds and the like into and out of elevator cabins in building elevators. Herrmann, which uses an elevating device than is not constrained in a cabin or other structure, but can move in three directions, is a much different elevating device than the device disclosed in Ach. And because the cabin structure is critical to the utilizing the loading devices disclosed in Ach, there would be no motivation to one of ordinary skill in the art familiar with the more mobile devices of Herrmann to look to the teachings of Ach.

Even if Ach were combined with the teachings of Herrmann and Vainio, all of the features of the invention in claim 1, as amended, would not be present. Specifically, an orienting device with first and second side faces, the first being selectively openable and the other *always closed*, is not shown. Rather Ach, specifically, shows an elevator cabin with bridge members on opposite sides that are both selectively able to be placed into open positions.

For at least the reasons stated above, reconsideration and withdrawal of the rejection of claim 1 is respectfully requested.

Claim 2 depends directly from claim 1 and is believed to be patentable for the reasons stated above. Reconsideration and withdrawal of the rejection of claim 2 is respectfully requested.

Regarding claim 3, neither the Herrmann, Vainio, nor Ach references, alone or in combination, teach or suggest a positioning device that is an elevating truck with a fork lift. Rather, Herrmann teaches a lifting device, but is not a truck because it is not readily transportable on wheels. Vainio teaches a fork lift used for initially loading and off loading paper rolls from storage areas, but not as a positioning devices within

the claimed system, used for actively traveling along primary transport paths towards and away from the secondary transport path. Ach does not teach or suggest an elevating truck with a fork lift.

Additionally, as previously stated, there is no motivation to combine the cited references. Reconsideration and withdrawal of the rejection of claim 3 is respectfully requested.

Claims 4-7 and 9 depend directly or indirectly from claim 1 and are believed to be patentable for the reasons stated above. Reconsideration and withdrawal of the rejection of claims 4-7 and 9 is respectfully requested.

Regarding claim 6, neither the Herrmann, Vainio, nor the Ach references teach or suggest an orienting device that includes a supporting frame which is rotateable around a vertical axis and which is suspended from a supporting beam. Rather, Herrmann teaches a device including two cross beams 22, but not a frame that is suspended from the supporting beams. Vainio discloses a stacker, but the stacker is not suspended from a supporting beam either. Ach does not teach a orienting device, as claimed. Because a supporting frame which is suspended from a supporting beam is not taught by the references alone or in combination, reconsideration and withdrawal of the rejection of claim 6 is respectfully requested.

Claims 7 and 9 depend indirectly from claim 1 and are believed to be allowable for the reasons stated above. Reconsideration and withdrawal of the rejection of claims 7 and 9 is respectfully requested.

Regarding claim 12, neither reference, alone or in combination teaches a means for elevating that comprises a plurality of chain hoists, which are synchronously driven, as required. Rather, Herrmann teaches a vertically movable

traveling trolley 20, but does not disclose the specific means for moving the trolley. Vainio teaches a stacker for changing the orientation of a transport carriage car, but does not teach means for moving the stacker up or down. Ach does not teach an orienting device as claimed. Because a means for elevating that comprises a plurality of chain hoists, synchronously driven, is not taught by the cited references, alone or in combination, reconsideration and withdrawal of the rejection of claim 12 is respectfully requested.

Claims 14-16 depend directly from claim 1 and is believed to be patentable for the reasons stated above. Reconsideration and withdrawal of the rejection of claim 14-16 is respectfully requested.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 18-0160, our Order No. FRR-12920.

Respectfully submitted,

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